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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KOICHI TANIGUCHI) CIVIL ACTION NO. 08-0008
)
Plaintiff,)
)
vs.) DEFENDANT'S
) INITIAL
KAN PACIFIC SAIPAN, LTD. dba) DISCLOSURES
Mariana Resort and Spa)
)
Defendant.)
)

Comes now Defendant KAN PACIFIC SAIPAN, LTD. dba Mariana Resort and Spa, pursuant to Rule 269(a) F.R.C.P. and LR 16.2CJ d, and files these Initial Disclosures:

1. Persons Likely To Have Discoverable Information.

Defendant expects to be able to supplement these disclosures by the time of the Case Management Conference:

- a. Yoshihiro Kitami, President, Mariana Resort & Spa; knowledge of Plaintiff's alleged claims, Plaintiff's numerous trips to Saipan after his alleged injury.

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- b. Mamoru Watanabe, Manager, Mariana Resort and Spa; knowledge of Plaintiff's alleged claims; Plaintiff's numerous trips to Saipan after his alleged injury.
- c. Hisato Endo; circumstances surrounding the execution of the contracts Plaintiff claims he could not perform under; actual payments made to Plaintiff before and after Plaintiff's alleged injury; circumstances surrounding the corporate existence, function and legitimacy of the Kyowa group companies.
- d. Jun Kitaoka; knowledge of Plaintiff's alleged claims; Plaintiff's numerous trips to Saipan after his alleged injury circumstances of the injury.
- e. Chifuyu Arai, MD; diagnosis, prognosis, treatment of plaintiff's injury.

Park Hospital, 1086 Sendano, Shiraoka, Saitama, Japan.

- f. Miki Ordonez, Spa Manager.
- g. Hajime Suzuki.

2. Documents Defendant May Use To Support It's Claims.

Documents reflecting Plaintiff's activities in Saipan after his alleged injury.

3. Insurance Policy.

Defendant's insurance policy has been sent to Plaintiff's attorney via DHL courier.

Dated this 17th day of March, 2008.

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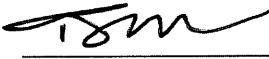
RICHARD W. PIERCE LAW OFFICE, LLC

Dated: _____

By: _____
RICHARD PIERCE

DOOLEY ROBERTS & FOWLER LLP

Dated: 3/17/08

By: 
TIM ROBERTS

Attorneys for Defendant KAN PACIFIC SAIPAN, LTD. dba Mariana Resort and Spa.